

Michael E. Greene (MEG 5519)
Robinson Brog Leinwand Greene Genovese & Gluck P.C.
Attorneys for Defendants
1345 Avenue of the Americas
New York, New York 10105
(212) 603-6300
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRUSTEES OF THE STRUCTURAL STEEL AND
BRIDGE PAINTERS OF GREATER NEW YORK
EMPLOYEE TRUST FUNDS and TRUSTEES OF THE
DISTRICT COUNCIL 9 PAINTING INDUSTRY
INSURANCE AND ANNUITY FUNDS,

Plaintiffs,

- against -

GEORGE CAMPBELL PAINTING CORP. and
FEDERAL INSURANCE COMPANY,

Defendants.
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Docket No. 08 CIV 3403

ANSWER

Defendants, George Campbell Painting Corp., by their attorneys Robinson Brog
Leinwand Greene Genovese & Gluck P.C., answer Plaintiffs' Complaint as follows:

1. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 1 of the Complaint.
2. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 2 of the Complaint.
3. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 3 of the Complaint.
4. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 4 of the Complaint.

5. Deny having knowledge or information sufficient to form a belief as to the allegations of the first sentence of paragraph 5 of the Complaint. Admit the allegations of the second sentence of paragraph 5 of the Complaint.
6. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 6 of the Complaint.
7. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 7 of the Complaint.
8. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 8 of the Complaint.
9. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 9 of the Complaint.
10. Leaves the issue of Defendant's status to the court's interpretation of the law.
11. Admit the allegations of paragraph 11 of the Complaint.
12. Admit the allegations of paragraph 12 of the Complaint.
13. Admit the allegations of paragraph 13 of the Complaint.
14. The Agreement, Trust Indenture and Poly referenced in paragraph 14 of the Complaint speaks for itself.
15. Admit the allegations of paragraph 15 of the Complaint.
16. Deny the allegations of paragraph 16 of the Complaint.
17. Admit the allegations of the first sentence of paragraph 17 of the Complaint. The Bonds referenced in the second sentence of paragraph 17 speak for themselves.
18. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 18 of the Complaint.

19. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 19 of the Complaint.
20. Deny the allegations of paragraph 20 of the Complaint.
21. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 21 of the Complaint.
22. Deny the allegations of paragraph 22 of the Complaint.
23. The Agreement referred to in paragraph 23 of the Complaint speaks for itself.
24. Deny the allegations of paragraph 24 of the Complaint.
25. The allegations of paragraph 25 are responded to as hereinbefore answered.
26. The statute, Agreement and Trust Indentures referred to in paragraph 26 of the Complaint speak for themselves.
27. Deny the allegations of paragraph 27 of the Complaint.
28. The statutes referenced in paragraph 28 of the Complaint speak for themselves.
29. Deny having knowledge or information sufficient to form a belief as to the allegations of paragraph 29 of the Complaint.
30. Deny the allegations of paragraph 30 of the Complaint.
31. Deny the allegations of paragraph 31 of the Complaint.
32. The allegations of paragraph 32 are responded to as hereinbefore answered.
33. Admit the allegations of paragraph 33 of the Complaint.
34. Deny the allegations of paragraph 34 of the Complaint.
35. Deny the allegations of the first sentence of paragraph 35 of the Complaint. Deny having knowledge or information sufficient to form a belief as to the allegations of the second sentence of paragraph 35 of the Complaint.

36. Deny the allegations of paragraph 36 of the Complaint.
37. The Agreement referenced in paragraph 37 of the Complaint speaks for itself.
38. Deny the allegations of paragraph 38 of the Complaint.
39. The allegations of paragraph 39 are as responded to as hereinbefore answered.
40. The statute, Agreement and Trust Indentures referenced in paragraph 40 of the Complaint speak for themselves.
41. Deny the allegations of paragraph 41 of the Complaint.
42. The statutes referenced in paragraph 42 of the Complaint speak for themselves.
43. Deny having knowledge or information sufficient to form a belief as to the allegations of the second sentence of paragraph 43 of the Complaint.
44. Deny the allegations of paragraph 44 of the Complaint.
45. Deny the allegations of paragraph 45 of the Complaint.
46. The statutes, Agreement and Trust Indentures referenced in paragraph 46 of the Complaint speak for themselves.
47. Deny the allegations of paragraph 47 of the Complaint.
48. Deny the allegations of paragraph 48 of the Complaint.


First Affirmative Defense

49. Plaintiffs' accounting is incorrect.

WHEREFORE, defendants pray that the Complaint herein be dismissed, that defendants be awarded their costs and disbursements and that such other and further relief as to the court may appear just and proper be granted.

DATED: New York, New York
June 26, 2008

ROBINSON BROG LEINWAND GREENE
GENOVESE & GLUCK P.C.

By: 
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 BRIDGE PAINTERS OF GREATER NEW YORK :
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AFFIDAVIT OF SERVICE

Plaintiffs,

- against -

GEORGE CAMPBELL PAINTING CORP. and
 FEDERAL INSURANCE COMPANY,

Defendants.
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STATE OF NEW YORK }
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 COUNTY OF NEW YORK } ss:

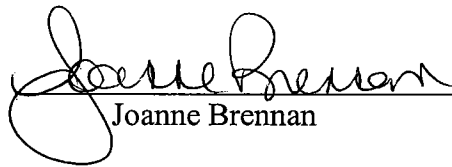
Joanne Brennan, being duly sworn, deposes and says, that deponent is not a party to the action, is over 18 years of age and resides in the County of Nassau, State of New York.

On the 27th day of June, 2008, I served the within **ANSWER and DEFENDANTS' RULE 7.1 STATEMENT** upon:

Dana L. Henke, Esq.
 Barnes, Iaccarino, Virginia, Ambinder & Shepherd, PLLC
 258 Saw Mill River Road
 Elmsford, New York 10523

Lampert & Weiss
 61 Broadway
 New York, NY 10006

Via Regular Mail in a stamped envelope in a depository under the care and custody of the United States Postal Service.


Joanne Brennan

Sworn to before me this
27th day of June, 2008


Notary Public

JUDETTE A. JENKINS
Notary Public, State of New York
No. 01JE4871171
Qualified in Queens County
Commission Expires September 8, 20 10